

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
(DETROIT)**

In re:)	
)	
CITY OF DETROIT, MICHIGAN,)	CASE NO.: 13-53846
)	
Debtor.)	CHAPTER 9
)	
)	Hon. Steven W. Rhodes
)	

**WATER AND SEWER TRUSTEE AND AD HOC BONDHOLDER
COMMITTEE'S SECOND REQUEST FOR
PRODUCTION OF DOCUMENTS TO DEBTOR**

U.S. Bank National Association (“U.S. Bank”), in its role as Trustee (the “Trustee”) for the outstanding water and sewer bonds (the “Bonds”) issued by the City of Detroit (the “City”), and the Ad Hoc Bondholder Committee¹ pursuant to Rule 7034 of the Federal Bankruptcy Rules and Rules 34 of the Federal Rules of Civil Procedure, propounds their Second Request for Production of Documents to the City, which supplement the *Water and Sewer Trustee and Ad Hoc Bondholder Committee’s First Request for Production of Documents to Debtor* (Doc. 3766) (the “First Request”), filed on April 3, 2014. The Trustee and Ad Hoc Bondholder Committee request that the City respond to this discovery and produce documents within thirty days, or as otherwise required by law, at the offices of the Trustee’s local counsel, Bodman PLC, 1901 St. Antoine Street, Sixth Floor, Detroit Michigan, 48226, unless otherwise agreed by the parties or ordered by the Court. The Trustee and Ad Hoc Bondholder Committee incorporate by reference, as if fully set forth herein, the Definitions and Instructions to the First Request.

¹ The Ad Hoc Bondholder Committee members are Fidelity Management & Research Company, Eaton Vance Management, Franklin Advisors, Inc., Nuveen Asset Management, and BlackRock Asset Management, Inc.

DOCUMENTS REQUESTED

57. Documents evincing all rate-setting agreements and negotiations regarding the same with all municipal counterparties, including, but not limited to, Genesee County.

RESPONSE:

58. Documents evincing negotiations, agreements or understandings with any municipal counterparties, including, without limitation, Genesee County, and any other County or entity (public or private) regarding disposition or “monetization” of the Systems or altering rates chargeable by the Systems.

RESPONSE:

Dated: April 8, 2014

/s/ Courtney Rogers

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing Second Request for Production of Documents to Debtor was served via email and overnight delivery on the following on the 8th day of April, 2014:

Ms. Heather Lennox
Jones Day
222 East 41st Street
New York, New York 10017

Mr. Bruce Bennett
Jones Day
555 South Flower Street
50th Floor
Los Angeles, California 90071

I hereby further certify that the foregoing was filed and served by the Court's electronic case filing and noticing system to all parties registered to receive electronic notices in this matter this 8th day of April.

/s/ Courtney Rogers

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